



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

September 20, 2016

**BY ECF AND EMAIL**

The Honorable P. Kevin Castel  
United States District Judge  
Daniel Patrick Moynihan Federal Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: **United States v. Gary Hirst,**  
**15 Cr. 643 (PKC)**

Dear Judge Castel:

The Government writes to briefly apprise the Court of its relevance objections to certain proposed defense exhibits. On September 11, 2016, the Government agreed to stipulate to the authenticity of certain defense exhibits but preserved its right to object to such exhibits on relevance grounds. Defense counsel has informed the Government that at the outset of the defense case tomorrow afternoon they intend to offer the stipulation and the exhibits referenced therein. Accordingly, the Government writes to notify the Court that the Government objects to the following exhibits on relevance grounds:<sup>1</sup>

311-313	314-316	1000
1001A-Y	1126-1128	1130-1131
1134	1141	1144

Respectfully submitted,

PREET BHARARA  
United States Attorney

By: /s/ Rebecca Mermelstein  
Brian R. Blais  
Rebecca Mermelstein  
Aimee Hector  
Assistant United States Attorneys  
(212) 637-2521/2360/2203

<sup>1</sup> The Government also intends to object to the admissibility of defense exhibits 808-809 on both authenticity and relevance grounds.